In response to that Office Action, please consider the following remarks.

<u>REMARKS</u>

This application has been reviewed in light of the Office Action dated

December 10, 2001. Claims 1-35 remain pending in this application. Claims 1, 8, 10, 12, 14,

19, 21, 23, 25, 30, 32, and 34 are in independent form. Favorable reconsideration is requested.

Claims 1-35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over

U.S. Patent No. 6,097,429 (Seeley et al.), in view of U.S. Patent No. 5,943,478 (Aggarwal et al.).

Applicant respectfully traverses the rejection of Claims 1-35 for the following reasons.

The aspect of the present invention set forth in Claim 1 is directed to a server for making it possible for a remote client to control image sensing means via a network and for providing a transfer service to transfer video information, which has been captured by the image sensing means, to the client via said network. The server includes input means for entering a request for information identifying the client to which the video information captured by said image sensing means is transferred and notification means responsive to the entered request for reporting the information identifying the client.

Seeley et al., as understood by Applicant, relates to a video security system physically located at a site being protected. In particular, Seeley et al. relates to an interface between one or more cameras positioned about the site for monitoring purposes, and an alarm unit, as well as the interface between a camera and a remote operator. Apparently, Seeley et al.

teaches that transferring information identifying a person if the person entering in the system is authorized (Column 9, lines 12-17). That is *Seeley et al.* merely discloses inputting information identifying a person captured by the video image sensing means.

In contrast, the claimed invention, as defined by independent Claim 1, enters a request for information identifying the client to which the video information captured by the image sensing means is transferred, and notifies in response to the entered request for reporting the information identifying the client. In other words, *Seeley et al.* discloses inputting information identifying the person captured by the image sensing means rather than information identifying the client to which video information is transferred via network. Applicant respectfully asserts that the input means of *Seeley et al.* is not the same as the input means recited in independent Claim 1. Further, the Office Action on page 3 specifically concedes that *Seeley et al.* does not explicitly teach notifying the information identifying the client. Accordingly, independent Claim 1 is patentable over *Seeley et al.*, taken alone.

Aggarwal et al. is not seen to add anything to overcome the above-mentioned deficiencies of Seeley et al. Aggarwal et al., as understood by Applicant, relates to a system for performing immediate point-to-point messaging over the Internet. Apparently, Aggarwal et al. teaches a technique for displaying lists, indicating users that are logged in. Nothing has been found in Aggarwal et al. that teaches or suggests input means for entering information identifying the client to which the video information captured by image sensing means is transferred.

Applicant submits that a combination of Seeley et al. and Aggarwal et al.,

assuming such combination would even be permissible, would fail to teach or suggest input means for entering a request for information identifying the client to which the video information captured by the image sensing means is transferred.

Accordingly, Applicant submits that Claim 1 is patentable over the cited art, and respectfully request withdrawal of the rejection under 35 U.S.C. § 103(a).

Independent Claims 8, 10, 12, 14, 19, 21, 23, 25, 30, 32, and 34 include a similar feature of input means for entering a request for information identifying the client to which the video information captured by the image sensing means is transferred, as discussed above in connection with Claim 1. Accordingly, Claims 8, 10, 12, 14, 19, 21, 23, 25, 30, 32, and 34 are believed to be patentable for at least the same reasons as discussed above in connection with Claim 1.

The other rejected claims in this application depend from one or another of the independent claims discussed above, and, therefore, are submitted to be patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

In view of the foregoing remarks, Applicant respectfully requests favorable reconsideration and early passage to issue of the present application.

Applicant's undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

Attorney for Applicant

Registration No. 37,586

FITZPATRICK, CELLA, HARPER & SCINTO 30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

NY_MAIN 242982 v 1